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February 20, 2025

**Via Email and ECF**

The Honorable Rachel P. Kovner  
U.S. District Judge  
U.S. District Court, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: U.S. v. Julio Medina, et al., 25-Cr-54 (RPK)

Dear Judge Kovner:

I represent Julio Medina in the above-referenced case. Mr. Medina was arrested on February 13, 2025. At his presentment, Magistrate Judge James Cho adopted the parties' recommended bail package of a \$250,000 personal recognizance bond ("the bond") secured by two properties owned by Mr. Medina in New York. We have provided documentation to the U.S. Attorney's Office showing Mr. Medina's ownership of the two properties and we jointly submit for Your Honor's consideration the attached proposed Order relative to those two properties. The Order provides, in short, that Mr. Medina may not sell, transfer or further encumber the properties, and that if the Court were to determine in the future, after having given Mr. Medina an opportunity to be heard, that Mr. Medina has violated the terms of his release, the Court can enter an order requiring forfeiture of the bond and the government could seek to forfeit the properties up to the amount of the bond, or \$250,000.

I have included herewith a copy of the Proposed Order already signed by my client, Julio Medina. Thank you for your consideration.

Respectfully submitted,



Lynn A. Neils

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